

4/2/2021 Case: 2:21-cv-01502-MHW-CMV Doc #: 1-1 Fibreclis @ Mark@ 12/21 Page: 2 of 42 PAGEID #: 20

+ 03/11/21	APPLIED - COURT COMPUTERIZATION			00	
+ 03/11/21	APPLIED - DEPOSIT FOR COSTS			00	
+ 03/11/21	MOTION GRANTED	7.	E3274	D93	1
+ 03/11/21	MISCELLANEOUS PAPER	7.	E3274	D94	1
03/11/21	DOCUMENT SEALED BY COURT	72-	E3274	D93	1
+ 03/11/21	MOTION	7.	E3274	D86	7
03/11/21	CASE INFORMATION SHEET	72-	E3274	D85	1
03/11/21	EXHIBITS	7.	S0215	M63	2
03/11/21	EXHIBITS	7.	S0215	M60	3
03/11/21	EXHIBITS	72	S0215	M58	2
03/11/21	EXHIBITS	72-	S0215	K04	252
+ 03/11/21	APPEARANCE FILED				
+ 03/11/21	JUDGE ASSIGNED - ORIGINAL				
03/11/21	COMPLAINT FILED	72	S0215	J81	22
03/11/21	JURY DEMAND - PLAINTIFF		UP000	A01	22
+ 03/11/21	APPEARANCE FILED		UP000	A01	22
+ 03/11/21	HEARING/EVENT SCHEDULED				
+ 03/11/21	HEARING/EVENT SCHEDULED				
+ 03/11/21	REQUEST FOR SERVICE - CERTIFIED MAIL				
+ 03/11/21	REQUEST FOR SERVICE - CERTIFIED MAIL				
+ 03/11/21	REQUEST FOR SERVICE - CERTIFIED MAIL				

In the Court of Co Ohio Department of Med	•	klin County, Ohio, General D	Division	
	/Appellant,	21CV 15	3 6.	
vs.		Case No		_
Centene Corporation, e	t al.			
Defenda	nt/Appellee,		CF 282	5 5 5
<u>Civ</u>	il Case Filing Info	rmation Summary	MAR ERK	RAM
Type of Action/Case Classific	cation:		0f	CIN CINC
Professional Tort (Ty (\$225.00 Security Deposit Required		Product Liability (Type B) (\$225.00 Security Deposit Required)		ZAS CO
Other Torts (Type C) (\$225.00 Security Deposit Require	d)	Workers Compensation (T (\$225.00 Security Deposit Required)	ype B))HIO
Foreclosure (Type E) (\$300.00 Security Deposit Required	d)	Administrative Appeal (Ty) (\$100.00 Security Deposit Required)	pe F)	
All Other Civil Cases (\$225.00 Security Deposit Require		Cognovit Confession of Jud (\$100.00 Security Deposit Required)	dgment (H)	
	Yes	Total Security Deposit \$		_
is a TEMPORARY RESTRA	INING ORDER b	eing requested at this time?		_
Is this a case in which ALL the	e issues presented a	re a result of the	(Yes or No)	
defendant(s) having signed and	,			
Is this a FORCIBLE ENTRY			(Yes or No)	
			(Yes or No)	_
Does this case include allegation ACT violations under Chapter				
protection provision of the Ohi	•	taction y consumer		
		. —	(Yes or No)	_
Refiling Information:				
If this is a REFILING of a pre	viously dismissed o	case, please complete the follow	•	
Previous Case No.		Original Judge	•	
Ra Willia		0030559		
Attorney/Party Signature		Attorney Ohio Sup. Ct. Registration No.		_
Donald W. Davis, Jr.		330-253-5060		_
Attorney/Party Name (Type or Print)		Telephone Number		
75 East Market Street		330-253-1977	 	_
Mailing Address Akron	OH 44308	Facsimile Number		
	7in Code	Email: dwdavis@bmdllc.co	אננו	

E3274 - D94

v.

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.

CASE NO.:

JUDGE

Plaintiffs,

21CV 1536

PRAECIPE

CENTENE CORPORATION, et al

Defendants.

Please issue Summons and serve via <u>Certified</u> with Complaint, Motion to File

Mail RETURN RECEIPT Requested

and Retain Complaint Under Seal for 30 Days, and Order.

Respectfully submitted,

Donald W. Davis, Jr. (#0030559)

Adam D. Fuller (#0076431)

Elizabeth Shively Boatwright (#0081264) BRENNAN, MANNA & DIAMOND, LLC

75 East Market Street Akron, OH 44308

Telephone: (330) 253-5060

Facsimile: (330) 253-1977

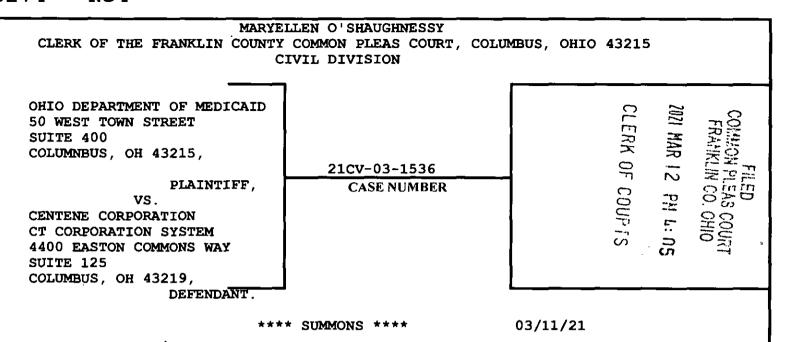
dwdavis@bmdllc.com

adfuller@bmdllc.com

esboatwright@bmdllc.com

Attorneys for Plaintiffs Ohio Department of Medicaid and The State of Ohio

E3274 - N34



TO THE FOLLOWING NAMED DEFENDANT:

BUCKEYE HEALTH PLAN CT CORPORATION 4400 EASTON COMMONS WAY SUITE 125 COLUMBUS, OH 43219

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO, OHIO DEPARTMENT OF MEDICAID

50 WEST TOWN STREET

SUITE 400

COLUMNBUS, OH 43215,

PLAINTIFF(S).

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF THE PLAINTIFF'S ATTORNEY IS:

> DONALD W. DAVIS BRENNAN, MANNA, DIAMOND 75 EAST MARKET STREET AKRON, OH 44308

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

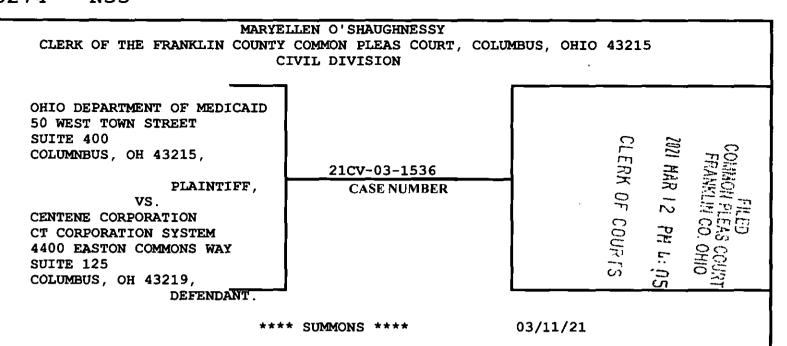
IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY CLERK OF THE COMMON PLEAS FRANKLIN COUNTY, OHIO

BY: BROOKE ELLIOTT, DEPUTY CLERK

(CIV370-S03)

E3274 - N35



TO THE FOLLOWING NAMED DEFENDANT:

CENTENE CORPORATION
CT CORPORATION SYSTEM
4400 EASTON COMMONS WAY
SUITE 125
COLUMBUS, OH 43219

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO,

BY:

OHIO DEPARTMENT OF MEDICAID 50 WEST TOWN STREET

SUITE 400

COLUMNBUS, OH 43215,

PLAINTIFF(S).

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF THE PLAINTIFF'S ATTORNEY IS:

DONALD W. DAVIS BRENNAN, MANNA, DIAMOND 75 EAST MARKET STREET AKRON, OH 44308

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

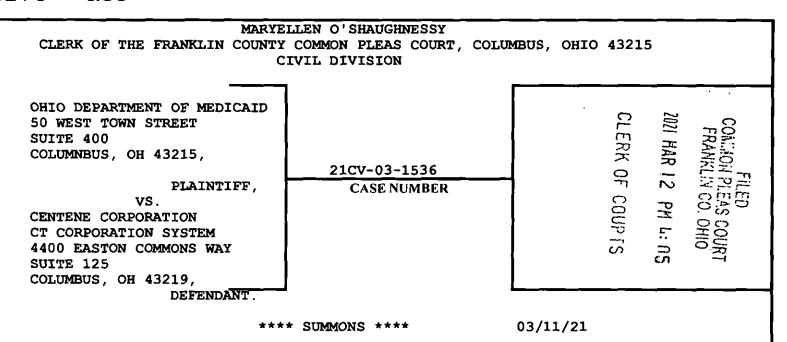
IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY CLERK OF THE COMMON PLEAS FRANKLIN COUNTY, OHIO

BY: BROOKE ELLIOTT, DEPUTY CLERK

(CIV370-S03)

E3274 - N33



TO THE FOLLOWING NAMED DEFENDANT:

ENVOLVE PHARMACY SOLUTIONS CT CORPORATION

4400 EASTON COMMONS WAY

SUITE 125

COLUMBUS, OH 43219

YOU HAVE BEEN NAMED DEFENDANT IN A COMPLAINT FILED IN FRANKLIN COUNTY COURT OF COMMON PLEAS, FRANKLIN COUNTY HALL OF JUSTICE, COLUMBUS, OHIO, BY: OHIO DEPARTMENT OF MEDICAID

50 WEST TOWN STREET

SUITE 400

COLUMNBUS, OH 43215,

PLAINTIFF(S).

A COPY OF THE COMPLAINT IS ATTACHED HERETO. THE NAME AND ADDRESS OF THE PLAINTIFF'S ATTORNEY IS:

DONALD W. DAVIS BRENNAN, MANNA, DIAMOND 75 EAST MARKET STREET AKRON, OH 44308

YOU ARE HEREBY SUMMONED AND REQUIRED TO SERVE UPON THE PLAINTIFF'S ATTORNEY, OR UPON THE PLAINTIFF, IF HE HAS NO ATTORNEY OF RECORD, A COPY OF AN ANSWER TO THE COMPLAINT WITHIN TWENTY-EIGHT DAYS AFTER THE SERVICE OF THIS SUMMONS ON YOU, EXCLUSIVE OF THE DAY OF SERVICE. YOUR ANSWER MUST BE FILED WITH THE COURT WITHIN THREE DAYS AFTER THE SERVICE OF A COPY OF THE ANSWER ON THE PLAINTIFF'S ATTORNEY.

IF YOU FAIL TO APPEAR AND DEFEND, JUDGMENT BY DEFAULT WILL BE RENDERED AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

MARYELLEN O'SHAUGHNESSY CLERK OF THE COMMON PLEAS FRANKLIN COUNTY, OHIO

BY: BROOKE ELLIOTT, DEPUTY CLERK

(CIV370-S03)

E3274 - D86

v.

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.

CASE NO.:

Plaintiffs.

JUDGE

21CV 1536

FILED COURTS

CENTENE CORPORATION, et al.

MOTION TO FILE AND RETAIN COMPLAINT UNDER SEAL FOR THIRTY DAYS

Defendants.

Now come Plaintiffs, by and through the undersigned counsel, and respectfully move this Court for permission to file the Complaint under seal. This motion is provisional in nature, seeking that the Complaint remain under seal for no more than thirty (30) days. As such, the parties are not waiving their rights to seek this Court's guidance/ruling(s) on the confidential nature, if any, of the information in the Complaint. While Plaintiffs believe the Complaint does not contain information entitled to remain under the Court's protection, Defendants should have an opportunity to be heard.

The parties entered into a Confidentiality and Nondisclosure Agreement which requires Plaintiffs to give notice to Defendants of the disclosure of potentially confidential information so that Defendants may seek a protective order or other appropriate remedy with respect to such anticipated disclosure. See Exhibit A. To preserve these issues and the parties' positions in advance of such information being placed in the public record, Plaintiffs request that this Court permit the filing of the Complaint under seal in order to permit Defendants the opportunity to consider seeking the entry of a protective order.

In light of the foregoing, Plaintiffs respectfully request that this Court permit the filing and retention of the Complaint under seal for thirty (30) days.

E3274 - D87

Respectfully submitted,

Donald W. Davis, Jr. (#0030559)

Adam D. Fuller (#0076431)

Elizabeth Shively Boatwright (#0081264) BRENNAN, MANNA & DIAMOND, LLC

75 East Market Street Akron, OH 44308

Telephone: (330) 253-5060 Facsimile: (330) 253-1977

dwdavis@bmdllc.com adfuller@bmdllc.com esboatwright@bmdllc.com

.....g....g....

Attorneys for Plaintiffs Ohio Department of Medicaid and The State of Ohio CONFIDENTIALITY AND NONDISCLOSURE AGREEMENT BETWEEN
BUCKEYE COMMUNITY HEALTH PLAN, INC., CENTENE CORPORATION,
ENVOLVE PHARMACY SOLUTIONS, INC., OHIO DEPARTMENT OF MEDICAID,
LISTON AND DEAS, PLLC, BRENNAN MANNA DIAMOND, LLC, and COHEN
MILSTEIN SELLERS & TOLL, PLLC

Buckeye Community Health Plan, Inc. dba Buckeye Health Plan, Centene Corporation, and Envolve Pharmacy Solutions, Inc. (collectively "Disclosers") enter into this Confidentiality and Nondisclosure Agreement with the Ohio Department of Medicaid, Liston and Deas, PLLC, Brennan Manna Diamond, LLC, Cohen Milstein Sellers & Toll, PLLC, (collectively "Recipients") as follows:

BACKGROUND

By correspondence dated July 22, 2019, the Ohio Department of Medicaid ("ODM") requested certain documents, information, and data ("Materials") from Buckeye Health Plan pursuant to the Provider Agreement existing between ODM and Buckeye Health Plan. ODM stated in the correspondence that, once produced, the Materials would be tendered to outside counsel for ODM and the State of Ohio, for analysis of pharmacy benefit management services rendered for or on behalf of Buckeye Health Plan members and ODM (the "Purpose"). Although Recipients do not concede that the Materials are proprietary or confidential, Disclosers contend that the Materials contain proprietary and highly sensitive confidential and trade secret business information the disclosure of which would adversely affect Disclosers' business interests and property rights, and in order to facilitate the cooperative exchange of materials between Disclosers and Recipients, the parties agree as follows:

AGREEMENT

- During the course of Disclosers' production of Materials, they may disclose to Recipients certain information that Disclosers deem proprietary or confidential, including, but not limited to, medical records, pharmacy records, materials relating to claims handling, proprietary internal material relating to network development, proprietary internal material relating to provider data, proprietary internal material relating to corporate strategy, proprietary internal material relating to pricing, material containing personally identifiable information, and protected health information ("PHI") covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule and other similar protections of sensitive medical and personally identifiable information (PII). The Materials shall be deemed confidential and proprietary and subject to restricted use and distribution as provided herein if plainly marked "confidential" or "proprietary," or marked with language of similar meaning, or otherwise disclosed under circumstances that reasonably suggests the confidential nature of the Materials, whether provided in written, encoded, graphic, photographic, or other tangible form, including any electronic or magnetic form. Designation of Materials as "confidential" or "proprietary" shall be based on a good faith belief that such Materials meet the definition of confidential or proprietary commercial, PHI or PII under Ohio law.
- 2. With respect to the Materials disclosed by Disclosers to Recipients, Recipients shall:
 - a) promptly and securely store the Materials, hold the Materials in confidence, and protect them with the same degree of care with which Recipients protect their own Materials of like importance (but in no event less than reasonable care) to protect against unauthorized disclosure of and preserve the confidentiality of the Materials under the terms of this Agreement;

- b) use the Materials only for the Purpose (except as may otherwise be provided by written agreement);
- c) except for anticipated use consistent with the Purpose, not copy or otherwise duplicate the Materials, or knowingly allow their copying or duplication, without Disclosers' prior written approval;
- d) restrict disclosure of the Materials to those employees, contractors and consultants of Recipients with a need to know and who shall be notified of, and required to comply with, this Agreement by contract, employee policies, work rules, or other appropriate methods, and who will not disclose the Materials to any third party;
- e) guarantee performance of this Agreement by each of Recipients' employees, owners, officers, directors, parents, subsidiaries, and affiliated legal entities, contractors, subcontractors, agents, advisors, investment bankers, attorneys, accountants, consultants, and all other representatives;
- f) promptly and informatively notify Disclosers in the event Recipients appear likely to be required to disclose, or in the opinion of its counsel should disclose, according to law, regulation, or judicial, administrative or governmental proceeding, any of the Materials, so that Disclosers, at their expense, may seek a protective order or other appropriate remedy with respect to such anticipated disclosure;
- g) Inform and keep informed Disclosers of any unauthorized disclosure of any of the Materials by any person at any time that comes to the knowledge or attention of Recipients.
- 3. Recipients have no obligation to preserve the confidential or proprietary nature of Materials that: are already known to Recipients through legal means, as evidenced by a writing dated

 $E3274^\circ - D91$

prior to disclosure, are or become generally known to the public at large, are not in violation of this Agreement, and are not otherwise required to be kept confidential.

ACCEPTED AND AGREED TO:

BUCKEYE COMMUNITY HEALTH PLAN, INC. DBA BUCKEYE HEALTH PLAN	ENVOLVE PHARMACY SOLUTIONS, INC.
.Ву:	Ву:
Title:	Title:
Date:	Date:
CENTENE CORPORATION	LISTON & DEAS, PLLC
Ву:	By: M. Dana Dena
Title:	Title: Partner
Date:	Date: 9/20/19
BRENNAN MANNA DIAMOND, LLC By: Canald W Carril	COHEN MILSTEIN SELLERS & TOLL, PLLC
Title: Member	Title: Partho
Date: 9/20/19	Date: 9/V3/19
OHIO DEPARTMENT OF MEDICAID By: 4 4 4	
lide: Director	
Date:9-30-19	

E3274 - D93

v.

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO OHIO DEPARTMENT OF MEDICAID, et al. CASE NO.: Plaintiffs, **JUDGE**

CENTENE CORPORATION, et al.

ORDER PERMITING THE COMPLAINT TO BE FILED AND RETAINED UNDER SEAL FOR THIRTY DAYS

Defendants.

This matter comes before this Court upon the Motion of Plaintiff to file the Complaint under seal.

Upon consideration of this matter, this Court finds the same well taken and the Motion is granted.

Therefore, this Court hereby orders that Plaintiffs are permitted to file the Complaint under seal with the Clerk of Courts. The Complaint shall be retained under seal with the Clerk of Courts for thirty (30) days or as otherwise ordered by this Court.

Plaintiffs shall have the Clerk of Courts serve a complete copy of the Complaint upon all Defendants along with a Summons, this Order and the Motion to File and Retain Complaint Under Seal for Thirty Days. Plaintiffs shall provide a copy of these filings to Defendants' counsel within twenty-four (24) hours of this Order.

IT IS SO ORDERED.

JUDGE

Approved:

Donald W. Davis, Jr. (#0030559)

Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	
)	JUDGE CHRIS M. BROWN
V.)	
)	
CENTENE CORPORATION, et al)	
)	
Defendant.)	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII (2) (A) (6), Donald W. Davis, Jr., Attorney for Ohio Department of Medicaid and the State of Ohio, moves the Court of Common Pleas to grant W. Lawrence Deas permission to appear *pro hac vice* and participate as co-counsel in this case for Ohio Department of Medicaid and the State of Ohio.

Movant represents that the following is a list of the jurisdictions in which W. Lawrence Deas_has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- 1. Mississippi, admitted April 2001, Bar# 100227
- 2. Alabama, admitted September 2000, Bar# 3989-A43 D

Movant represents that W. Lawrence Deas has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov, Bar R. XII (2) (A) (5).

Donald W. Davis, Jr. an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov. Bar R. XII (2)(A)(6), a copy of Movant's certificate of pro

hac vice registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if the Motion is granted, Movant must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the order.

Respectfully Submitted,

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559)
Adam D. Fuller (0076431)
Elizabeth Shively Boatwright (#0081264)
Brennan, Manna & Diamond, LLC
75 East Market Street
Akron, Ohio 44308
(330) 253-5060 / (330) 253-1977 (Fax)
dwdavis@bmdllc.com
adfuller@bmdllc.com
esboatwright@bmdllc.com

/s/W. Lawrence Deas

W. Lawrence Deas PHV-21103-2020 Liston & Deas, PLLC 605 Crescent Blvd., Suite 200 Ridgeland, MS. 39157 (601) 981-1636 /(601) 982-0371 (Fax) lawrence@listondeas.com

2659 Lake Circle Jackson, MS. 39211 (Residential Address)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the Franklin County Clerk of Courts this 26th day of March, 2021. Service will be made electronically by the Clerk's office.

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559)

The Supreme Court of Ohio

OFFICE OF ATTORNEY SERVICES

(Attorney Name) FOR PRO HAC VICE REGISTRATION Milliam Lawrence Deas (Attorney Name) (At	IN THE MATTER OF THE APPLICATI	ON OF
FOR PRO HAC VICE REGISTRATION William Lawrence Deas (Attorney Name) (At	William Lawrence Deas	
Alabama Choose one: I am currently suspended from the practice of law in the following jurisdiction where I have been admitted to practice. I have not resigned from the practice of law in the following jurisdiction (only list admission to the highest court of a state and ensure the same admissions are listed in your online account. Attach additional page if necessary): Alabama Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	(Attorney Name)	Gov. Bar R. XII, Section 2(A)(3)
, being first duly cautioned, swears or affirms as follows: I have never been disbarred from the practice of law. I have been admitted to the practice of law in the following jurisdictions (only list admission to the highest court of a state and ensure the same admissions are listed in your online account. Attach additional page if necessary): Mississippi Alabama Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	FOR PRO HAC VICE REGISTRATION	ON
(Attorney Name) i. I have never been disbarred from the practice of law. i. I have been admitted to the practice of law in the following jurisdictions (only list admission to the highest court of a state and ensure the same admissions are listed in your online account. Attach additional page if necessary): Mississippi Alabama Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: I. Choose one: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	William Lawrence Deas	haine first date anutioned arrange or afficure of
Alabama Choose one: I have been admitted to the practice of law in the following jurisdictions (only list admission to the highest court of a state and ensure the same admissions are listed in your online account. Attach additional page if necessary): Mississippi Alabama Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: Choose one: I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	(Attorney Name) follows:	, being first daily cautioned, swears of animins as
admission to the highest court of a state and ensure the same admissions are listed in your online account. Attach additional page if necessary): Mississippi Alabama Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: Choose one: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	a. I have never been disbarred from th	e practice of law.
Choose one: I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: I. Choose one: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	admission to the highest court of a	state and ensure the same admissions are listed in your
I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice. I am currently suspended from the practice of law in the following jurisdictions: Choose one: I have not resigned from the practice of law with discipline pending in any jurisdictio where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	Mississippi	Alabama
I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice. I have resigned from the practice of law with discipline pending in the following	I am not currently suspended from been admitted to practice.	
The second of the	where I have been admitted to p	practice.
	Sworn to or affirm a fixed one and sult in the state of the CALHOUN Commission Expires Aug. 5, 2023	pscribed in my presence the 19_day of <u>March</u> ppiand county of <u>Waddaba</u> Late and County of Waddaba

date are required.

THE SUPREME COURT of OHIO

Office of Attorney Services

IN THE MATTER OF THE APPLICATION OF

William Deas

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of PRO HAC VICE REGISTRATION 2021

Registration Number: PHV- 21103-2021

William Deas

, having met the requirements of, and found to be in

full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Gina White Palmer Director, Attorney Services

Expires December 31, 2021

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	
V.)	JUDGE CHRIS M. BROWN
CENTENE CORPORATION, et al)	
Defendant.)	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII (2) (A) (6), Donald W. Davis, Jr., Attorney for Ohio Department of Medicaid and the State of Ohio, and moves the Court of Common Pleas to grant Matthew C. McDonald permission to appear *pro hac vice* and participate as co-counsel in this case for the Ohio Department of Medicaid and the State of Ohio.

Movant represents that the following is a list of the jurisdictions in which Matthew C. McDonald has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

1. Mississippi, admitted September 2019, Bar# 105966

Movant represents that Matthew C. McDonald has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov, Bar R. XII (2) (A) (5).

Donald W. Davis, Jr. an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov. Bar R. XII (2)(A)(6), a copy of Movant's certificate of pro hac vice registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a

certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if the Motion is granted, Movant must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the order.

Respectfully Submitted,

/s/ Donald W. Davis, Jr.

Donald W. Davis, Jr. (#0030559)
Adam D. Fuller (0076431)
Elizabeth Shively Boatwright (#0081264)
Brennan, Manna & Diamond, LLC
75 East Market Street
Akron, Ohio 44308
(330) 253-5060 / (330) 253-1977 (Fax)
dwdavis@bmdllc.com
adfuller@bmdllc.com
esboatwright@bmdllc.com

/s/ Matthew C. McDonald

Matthew C. McDonald PHV-21872-2020 David Nutt & Associates, PC 605 Crescent Blvd., Suite 200 Ridgeland, MS 39157 (601) 898-7302 / (601) 898-7304 (Fax) MattM@davidnutt.com

4625 Friar Circle Jackson, MS. 39211 (Residential Address)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the Franklin County Clerk of Courts this 26th day of March, 2021. Service will be made electronically by the Clerk's office.

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559)

IN THE MATTER OF THE MOTION OF	CASE NO. 21-CV-1536
Matthew C. McDonald	
FOR PERMISSION TO APPEAR PRO HAC VICE	AFFIDAVIT OF OUT-OF-STATE ATTORNEY Gov. Bar R. XII, Section 2(A)(6)
Matthew C. McDonald bein	ng first duly cautioned, swears or affirms as
ollows:	
. I have never been disbarred from the practice	of law.
I have been admitted to the practice of law in jurisdictions if necessary):	
Mississippi	
 Choose one: ✓ I am not currently suspended from the prabeen admitted to practice. ✓ I am currently suspended from the practice. 	
l. Choose one:	nw with discipline pending in any jurisdiction
	Methew C. Mahad SIGNATURE OF APPLICANT
Sworn to or affirmed before me and subscribed i	n my presence the 12 day of March
20 <u>21</u> , in the state of Mississippi.	and county of Madison July Julys
*Affix stamp & seal (required in thio) son Explication of the committee of	/ SIGNATURE OF NOTARY PUBLIC

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Matthew McDonald

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of PRO HAC VICE REGISTRATION 2021

Registration Number: PHV- 21872-2021

Matthew McDonald

, having met the requirements of, and found to be in

full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Gina White Palmer Director, Attorney Services

Expires December 31, 2021

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	
)	JUDGE CHRIS M. BROWN
V.)	
CENTENE CORPORATION, et al	ĺ	
Defendant.)	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII (2) (A) (6), Donald W. Davis, Jr., Attorney for Ohio Department of Medicaid and the State of Ohio, and moves the Court of Common Pleas to grant Christina D. Saler permission to appear *pro hac vice* and participate as co-counsel in this case for Ohio Department of Medicaid and the State of Ohio.

Movant represents that the following is a list of the jurisdictions in which Christina D. Saler has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- 1. New Jersey, admitted December 2003, Bar # 022402003
- 2. Pennsylvania, admitted December 2003, Bar # 92017

Movant represents that Christina D. Saler has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov, Bar R. XII (2) (A) (5).

Donald W. Davis, Jr. and active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov. Bar R. XII (2)(A)(6), a copy of Movant's certificate of pro

hac vice registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if the Motion is granted, Movant must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the order.

Respectfully Submitted,

/s/ Donald W. Davis, Jr.

Donald W. Davis, Jr. (#0030559)
Adam D. Fuller (0076431)
Elizabeth Shively Boatwright (#0081264)
Brennan, Manna & Diamond, LLC
75 East Market Street
Akron, Ohio 44308
(330) 253-5060 / (330) 253-1977 (Fax)
dwdavis@bmdllc.com
adfuller@bmdllc.com
esboatwright@bmdllc.com

/s/Christina D. Saler

Christina D. Saler
PHV-21176-2021
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave. NW Fifth Floor
Washington, DC 20005
(267)479-5700/ Fax (267)479-5701
CSaler@cohenmilstein.com

350 Llandrillo Road Bala Cynwyd, PA 19004 (Residential Address)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the Franklin County Clerk of Courts this 26th day of March, 2021. Service will be made electronically by the Clerk's office.

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559

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IN THE MATTER OF THE MOTION OF	CASE NO	21-CV-1536
Christina D. Saler	4.3	FIDAVIT OF
FOR PERMISSION TO APPEAR PRO HAC VICE	OUT-OF-	STATE ATTORNEY XII, Section 2(A)(6)
Christina D. Saler bein	ng first duly caution	ed, swears or affirms as
ollows:		
I have never been disbarred from the practice	of law.	
. Thave been admitted to the practice of law in jurisdictions if necessary):	the following jurisd	ictions (attach additional
New Jersey	Pen	nsylvania
I have not resigned from the practice of lawhere I have been admitted to practice. I have resigned from the practice of law y jurisdiction(s):		
		ng in the following
	SIGNATURE OF APP	
Swom to or affirmed before me and subscribed to	SIGNATURE OF APP	CICANT
(), A	SIGNATURE OF APP	CICANT

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Christina Saler

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of PRO HAC VICE REGISTRATION 2021

Registration Number: PHV- 21176-2021

Christina Saler

, having met the requirements of, and found to be in

full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Gina White Palmer Director, Attorney Services

Expires December 31, 2021

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	HIDGE CUDIC M. DDOWN
\mathbf{v} .)	JUDGE CHRIS M. BROWN
CENTENE CORPORATION, et al)	
Defendant.)	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII (2) (A) (6), Donald W. Davis, Jr., Attorney for Ohio Department of Medicaid and the State of Ohio, moves the Court of Common Pleas to grant Steven J. Toll permission to appear *pro hac vice* and participate as co-counsel in this case for Ohio Department of Medicaid and the State of Ohio.

Movant represents that the following is a list of the jurisdictions in which Steven J. Toll_has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- 1. District of Columbia, admitted March 1976, Bar # 225623
- 2. Virginia, admitted September 1975, Bar # 15300

Movant represents that Steven J. Toll has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov, Bar R. XII (2) (A) (5).

Donald W. Davis, Jr. an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov. Bar R. XII (2)(A)(6), a copy of Movant's certificate of pro

hac vice registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if the Motion is granted, Movant must file a Notice of Permission to Appear *Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the order.

Respectfully Submitted,

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559)
Adam D. Fuller (0076431)
Elizabeth Shively Boatwright (#0081264)
Brennan, Manna & Diamond, LLC
75 East Market Street
Akron, Ohio 44308
(330) 253-5060 / (330) 253-1977 (Fax)
dwdavis@bmdllc.com
adfuller@bmdllc.com
esboatwright@bmdllc.com

/s/Steven J. Toll

Steven J. Toll
PHV-21177-2021
Cohen Milstein Sellers & Toll PLLC
1100 New York Ave. NW Fifth Floor
Washington, DC 20005
(202) 408-4600/ Fax (202) 408-4699
SToll@cohenmilstein.com

1543 Brookhaven Dr., Mclean, VA 22101 (Residential Address)

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the Franklin County Clerk of Courts this 26th day of March, 2021. Service will be made electronically by the Clerk's office.

/s/ Donald W. Davis, Jr.
Donald W. Davis, Jr. (#0030559)

IN THE MATTER OF THE MOTION OF	CASE NO. <u>21-CV-153</u>	36
Steven J. Toll	4 FFF17 107FF 601	er
FOR PERMISSION TO APPEAR PRO HAC VICE	AFFIDAVIT OI OUT-OF-STATE ATT Gov. Bar R. XII, Section	ORNEY
Steven J. Toll bein	g first duly cautioned, swears	or affirms as
ollows:		
a. I have never been disbarred from the practice	of law.	
 I have been admitted to the practice of law in jurisdictions if necessary): 	he following jurisdictions (atta	ach additional
District of Columbia	Virginia	
✓ I have not resigned from the practice of la where I have been admitted to practice. I have resigned from the practice of law w		
where I have been admitted to practice.		
✓ I have not resigned from the practice of la where I have been admitted to practice. I have resigned from the practice of law w	signature of Applicant my presence the 23 day of	llowing

THE SUPREME COURT of OHIO

Office of Attorney Services

IN THE	TOUT A TETTET BY	6327	7878787	APPI	ICATION	1837

PRO HAC VICE REGISTRATION

2021

Certificate of

Steven Toll

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Registration Number: PHV- 21177-2021

Steven Toll

, having met the requirements of, and found to be in

full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Gina White Palmer Director, Attorney Services

Expires December 31, 2021

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	
)	JUDGE CHRIS M. BROWN
V.)	
)	
CENTENE CORPORATION, et al)	
)	
Defendant.)	

ORDER GRANTING PERMISSION TO APPEAR PRO HAC VICE

This matter comes before the Court on the Motion of Attorney W. Lawrence Deas (Mississippi Bar # 100227 and Alabama Bar #3989-A43 D) for admission pro hac vice on behalf of Plaintiffs Ohio Department of Medicaid and the State of Ohio. For good cause having been shown, the aforementioned Motion is hereby GRANTED, and Attorney W. Lawrence Deas is hereby admitted to appear and practice before this Court on behalf of Plaintiff Ohio Department of Medicaid and the State of Ohio.

IT IS SO ORDERED.

JUDGE CHRIS M. BROWN

/s/ Donald W. Davis, Jr.

Donald W. Davis, Jr. (#0030559) Brennan, Manna & Diamond Attorney for Plaintiff

Franklin County Court of Common Pleas

Date: 03-29-2021

Case Title: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE

CORPORATION

Case Number: 21CV001536

Type: ORDER

It Is So Ordered.

/s/s Judge Christopher M. Brown

Electronically signed on 2021-Mar-29 page 2 of 2

Court Disposition

Case Number: 21CV001536

Case Style: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE CORPORATION

Motion Tie Off Information:

1. Motion CMS Document Id: 21CV0015362021-03-2699980000 Document Title: 03-26-2021-MOTION FOR PRO HAC VICE -PLAINTIFF: OHIO DEPARTMENT OF MEDICAID

Disposition: MOTION GRANTED

IN THE COURT OF FRANKLIN CO	
OHIO DEPARTMENT OF MEDICAID, et al.) CASE NO. 21 CV 1536
Plaintiff,))) JUDGE CHRIS M. BROWN
V.))
CENTENE CORPORATION, et al))
Defendant.))
ORDER GRANTING PERMISSION	ON TO APPEAR PRO HAC VICE
This matter comes before the Court on	the Motion of Attorney Matthew C. McDonald
(Mississippi Bar # 105966) for admission pro ha	c vice on behalf of Plaintiffs Ohio Department of
Medicaid and the State of Ohio. For good cause	having been shown, the aforementioned Motion
is hereby GRANTED, and Attorney Matthew (C. McDonald is hereby admitted to appear and

practice before this Court on behalf of Plaintiff, Ohio Department of Medicaid and the State of

JUDGE CHRIS M. BROWN

Ohio.

IT IS SO ORDERED.

Donald W. Davis, Jr. (#0030559) Brennan, Manna & Diamond

/s/ Donald W. Davis, Jr.

Attorney for Plaintiff

Franklin County Court of Common Pleas

Date: 03-29-2021

Case Title: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE

CORPORATION

Case Number: 21CV001536

Type: ORDER

It Is So Ordered.

/s/s Judge Christopher M. Brown

Electronically signed on 2021-Mar-29 page 2 of 2

Court Disposition

Case Number: 21CV001536

Case Style: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE CORPORATION

Motion Tie Off Information:

1. Motion CMS Document Id: 21CV0015362021-03-2699970000
Document Title: 03-26-2021-MOTION FOR PRO HAC VICE PLAINTIFF: OHIO DEPARTMENT OF MEDICAID

Disposition: MOTION GRANTED

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
Plaintiff,)	
)	JUDGE CHRIS M. BROWN
V.)	
CENTENE CORPORATION, et al)	
Defendant.)	

ORDER GRANTING PERMISSION TO APPEAR PRO HAC VICE

This matter comes before the Court on the Motion of Attorney Steven J. Toll (District of Columbia # 225623 and Virginia Bar # 15300) for admission *pro hac vice* on behalf of Plaintiffs Ohio Department of Medicaid and the State of Ohio. For good cause having been shown, the aforementioned Motion is hereby GRANTED, and Attorney Steven J. Toll is hereby admitted to appear and practice before this Court on behalf of Plaintiff Ohio Department of Medicaid and the State of Ohio.

IT IS SO ORDERED.

JUDGE CHRIS M. BROWN

/s/ Donald W. Davis, Jr.

Donald W. Davis, Jr. (#0030559) Brennan, Manna & Diamond Attorney for Plaintiff

Franklin County Court of Common Pleas

Date: 03-29-2021

Case Title: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE

CORPORATION

Case Number: 21CV001536

Type: ORDER

It Is So Ordered.

/s/s Judge Christopher M. Brown

Electronically signed on 2021-Mar-29 page 2 of 2

IN THE COURT OF COMMON PLEAS FRANKLIN COUNTY, OHIO

OHIO DEPARTMENT OF MEDICAID, et al.)	CASE NO. 21 CV 1536
)	
Plaintiff,)	
)	JUDGE CHRIS M. BROWN
V.)	
)	
CENTENE CORPORATION, et al)	
)	
Defendant.)	

ORDER GRANTING PERMISSION TO APPEAR PRO HAC VICE

This matter comes before the Court on the Motion of Attorney Christina D. Saler (New Jersey Bar # 022402003 and Pennsylvania Bar # 92017) for admission *pro hac vice* on behalf of Plaintiffs Ohio Department of Medicaid and the State of Ohio. For good cause having been shown, the aforementioned Motion is hereby GRANTED, and Attorney Christina D. Saler is hereby admitted to appear and practice before this Court on behalf of Plaintiff Ohio Department of Medicaid and the State of Ohio.

IT IS SO ORDERED.

JUDGE CHRIS M. BROWN

/s/ Donald W. Davis, Jr.

Donald W. Davis, Jr. (#0030559) Brennan, Manna & Diamond Attorney for Plaintiff

Franklin County Court of Common Pleas

Date: 03-29-2021

Case Title: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE

CORPORATION

Case Number: 21CV001536

Type: ORDER

It Is So Ordered.

/s/s Judge Christopher M. Brown

Electronically signed on 2021-Mar-29 page 2 of 2

Court Disposition

Case Number: 21CV001536

Case Style: OHIO DEPARTMENT OF MEDICAID -VS- CENTENE CORPORATION

Motion Tie Off Information:

1. Motion CMS Document Id: 21CV0015362021-03-2699950000 Document Title: 03-26-2021-MOTION FOR PRO HAC VICE -

PLAINTIFF: OHIO DEPARTMENT OF MEDICAID

Disposition: MOTION GRANTED